

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CMBB LLC)	
)	
)	Case No. 08 CV 1201
Plaintiff,)	
)	
v.)	Judge Shadur
)	
LOCKWOOD MANUFACTURING, INC.,)	
JENNIFER M. BRYAN, and)	
CAINCO EQUIPAMENTOS PARA)	
PANIFICADO LTD.)	
)	
Defendants.)	

**MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Plaintiff, CMBB, LLC, by its attorneys Franczek Sullivan P.C. and Bailey Cavalieri LLC, hereby moves for an extension of time to file its Response to Defendants' Motion for Protective Order. In support of this motion, Plaintiff states as follows:

1. On August 7, 2008, Defendants' filed their Motion for Protective Order to be heard on August 13, 2008.

2. On August 13, 2008, the parties appeared before this Court. At the hearing, Judge Shadur ordered Plaintiff to respond to Defendants' Motion by August 27, 2008, and that he would address whether a reply was necessary at the status on September 4, 2008 at 9:00 a.m. (A copy of Judge Shadur's Order is attached hereto as Exhibit A).

3. Plaintiff had every intention of timely filing its response to Defendants' Motion. Unfortunately, late last week, the health of the mother of lead counsel for Plaintiff, Evan Price, began to rapidly deteriorate. She is expected to pass away in the

next twenty-four to forty-eight hours. As a result, Plaintiff requests additional time up to and including September 5, 2008 to file its response. Plaintiff also requests that the status hearing scheduled for this matter be re-scheduled to September 17, 2008 at 9:00 a.m.

4. Counsel for Plaintiff, Staci Ketay Rotman, has conferred with counsel for Defendants, Lorne Saeks, as to Plaintiff's request and Mr. Saeks indicated that Defendants would not oppose this motion.

WHEREFORE, Plaintiff CMBB, LCC, respectfully prays that this Court extend the due date for its Response to Defendants' Motion for Protective Order up to and including September 5, 2008 and re-schedule the status hearing to September 17, 2008.

Respectfully submitted,

CMBB LLC

By: s/Staci Ketay Rotman - 06243241
One of Its Attorneys

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William Evan Price II (appearing *pro hac vice*)
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Dated: August 25, 2008

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that she caused a true and correct copy of the foregoing **MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER** to be filed using the CM/EFC system which will send notification of such filing to the following on this 25th day of August, 2008:

Anthony C. Valiulius
Lorne Todd Saeks
Cassandra M. Crane
Much Shelist Denenberg Ament & Rubenstein, P.C.
191 North Wacker Drive, Suite 1800
Chicago, IL 60606

s/Staci Ketay Rotman - 06243241
Staci Ketay Rotman